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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JAN 6 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Billed Party Preference
for 0+ InterLATA Calls

CC Docket No. 92-77
Phase I

REPLY COMMENTS

MCI Telecommunications Corporation (MCI) hereby replies to the comments submitted in response to the Commission's request for further comment in the Report and Order and Request for Supplemental Comment^{1/} (Order) released in the above-captioned proceeding. In the Order, the Commission asked for comment on "methods for compensating operator service providers who continue to receive 0+ dialed proprietary card calls and who wish to transfer those calls to the card issuer for completion."^{2/}

The commentators overwhelmingly support MCI's position that OSPs should receive compensation for 0+ dialed proprietary card calls that they wish to transfer to the card issuer.^{3/} As demonstrated by the parties, OSPs incur significant costs when

^{1/} In the Matter of Billed Party Preference for 0+ InterLATA Calls, Report and Order and Request for Supplemental Comment, CC Docket No. 92-77, Phase I, FCC 92-465 released November 6, 1992.

^{2/} Order at para. 64.

^{3/} See, Supplemental Comments of the Competitive Telecommunications Association (CompTel Comments), Supplemental Comments of LDDS Communications, Inc. (LDDS Comments), Value-Added Communications Inc., Supplemental Comments of International Telecharge, Inc. (ITI Comments), Comments of U.S. Long Distance, Inc. (U.S. Long Distance Comments), Supplemental Comments of Capital Network System, Inc. (Comments of CNS), Comments of One Call Communications, Inc. d/b/a Opticom, Comments of Intellicall, Inc., and Comments of National Tele-Sav, Inc.

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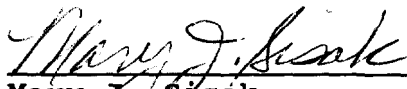
consumers inappropriately dial 0+ with a proprietary card and reach the OSP. Moreover, the Commission found that AT&T's calling card practices have contributed to this problem. Accordingly, OSPs should be allowed to recover the costs incurred as a result of AT&T's marketing practices.

The commentors also support MCI's position that OSPs should be allowed to transfer calls via different mechanisms including redialing instructions.^{4/} As demonstrated by the commentors, OSPs incur costs when they receive 0+ dialed proprietary card calls and inform the caller to redial the card issuing carrier. Moreover, by providing the caller with redialing instructions, the OSP has assisted the caller in reaching its preferred carrier to complete the call. Accordingly, OSPs should be compensated for transferring calls in this manner.

Based on the foregoing, MCI respectfully requests the Commission to adopt the proposals contained herein and in its Comments.

Respectfully submitted,
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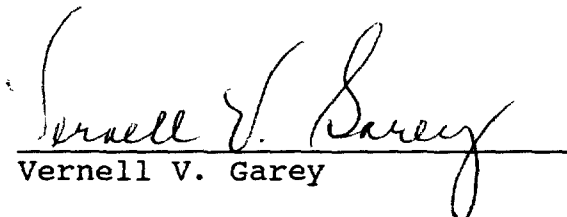
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Dated: January 6, 1993

^{4/} See, CompTel Comments, LDDS Comments, ITI Comments, U.S. Long Distance Comments, and Comments of CNS.

CERTIFICATE OF SERVICE

I, Vernell V. Garey, do hereby certify that on this 6th day of January, 1993, copies of the foregoing "Reply Comments" in CC Docket No. 92-77 were served by first-class mail, postage prepaid, unless otherwise indicated, upon the parties on the attached list.


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